

Case 2:20-cv-00427-WSS-CPE Document 1-3 Filed 03/27/20 Page 1 of 32
ANANT KUMAR TRIPATI #102081
ASPC - FLORENCE/EAST UNIT
P.O. BOX 5000
FLORENCE, ARIZONA 85132

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

ANANT KUMAR TRIPATI,
PLAINTIFF

CASE NO: 20-427

vs.

WEXFORD HEALT SOURCES INC., MATTHEW R. ZWICK, SAMUEL H. FORMAN,
WEBER GALLAGHER SIMPSON STAPLETON PIERES & NEWBY LLP, JONAH E. RAPPAZZO,
BRANDI C. BLAIR, JOHN HOCHULI, JAMES SKELTON HOCHULI PLS, CORIZON INC.,
QUINTAIROS PRIETO WOOD & BOYER P.A., ANTHONY J. FERNANDEZ, NICOLE ROWE,
JOSEPH SCOTT CONLON, CHARLES STEDMAN HOVER III, TIMOTHY REGIS GRIMM II,
KRISTIN WHITNEY BASHA, RENAUD COOK DRURY MESAROS P.A., KELLY JOAN MORRISSE,
PAUL EDWARD CARTER, DARYL JOHNSON, KARYN KLAUSNER, COURTNEY SLYNN,
CHERYL DOSSETT, DIANE BOUSHEZSWICZ, BETTY ULLIBARRI, CENTURION OF
ARIZONA, SARAH L. BARNES, BROENING OBERT WOODS & WILSON P.C., CENTUR
MANAGEMENT CORP., MICHAEL E. GOTTFRIED, KATHERINE E. WATANABE, LUCY M.
RAUD, DANIEL P. STRUCK, KATHLEEN L. WIENERE, TIMOTHY J. BOSANDOWSKY, RACHEL
LOVE, NICHOLAS D. ALEDO, ASHLER B. FLETCHER, ANNE M. ORCUTT, STRUCK, WIENERE
& LOVE P.L.C., CHARLES L. RYAN, DAVID SHINN.,
DEFENDANTS.

VERIFIED COMPLAINT JURY DEMAND
COUNT I EIGHTH AMENDMENT
COUNT II FRAUDULENT CONCEALMENT, FRAUD, DECEIT
COUNT III CUSTOMARY INTERNATIONAL LAW
COUNT IV CONSPIRACY

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Introduction

① Attached is a February 19, 2020 Admissibility finding after a 13 year investigation.

THE INVESTIGATION

(Exhibit-1) ① Moreover, The alleged victim claims to have been the subject of retaliatory action while in prison, including the denial of food and medical treatment, the destruction of his personal belongings and legal documents, and the refusal to grant him access to legal counsel, resources and materials. [et 3]

(Exhibit-1) ⑥ The petitioner alleges that prison authorities have taken retaliatory actions against him as a result of his continued efforts to litigate his case and as a result of complaints lodged by him against the Arizona Department of Corrections [hereinafter, "ADOC"]. In this regard, he claims that they have denied him access to adequate medical service, have destroyed files relating to his case and denied him access to his counsel and have denied him food prepared in accordance with his Hindu religious beliefs. They have also denied him access to legal resources and information afforded to other inmates and placed him at the farthest

end of the prison to restrict access to those resources.

(Exhibit-1) ⑦ According to the petition, The alleged victim has attempted to obtain relief from these measures by communicating them to several authorities. Moreover, in 2017, in order to respond to a request for information from the IACHR, the petitioner requested the U.S. District Court for the District of Arizona to provide him with an electronic copy of judicial documents pertaining to his case since his copies had been lost or destroyed by the ADOC and he did not have funds to pay for new copies. The District Court considered that while it may be able to pay for service of process on behalf of an indigent litigant and, in certain cases, to pay the costs of printing the record on appeal and preparing a transcript of proceedings, the same does not authorize the court to pay the cost for an indigent litigant's general copy request. It therefore rejected his request and noted that he could obtain the copies he desired by submitting a written request accompanied by an appropriate payment of 50 cents per page plus a 64 dollar retrieval fee to retrieve his

Case File from the archives.

(Exhibit-1) ⑬ With respect to the alleged denial of food and medical treatment, the IACHR notes that Mr. Tripathi filed multiple medical grievances to the ADOC, many of them subsequent to filing the present petition before the IACHR. Moreover, with respect to the alleged destruction and alteration of evidence, the denial of access to counsel, the opening of his legal correspondence and the denial of access to legal resources, the case file also contains multiple letters sent to the prison warden and the ADOC concerning these matters between 2009 and 2016. In accordance with the doctrine of the IACHR, the analysis concerning the requirements set forth in Article 32.1 of the IACHR Rules of Procedure shall be carried out in light of the situation existing at the moment when it decides on the admissibility or inadmissibility of a petition.

(Exhibit-1) ⑭ Without prejudging the merits of the complaint, after examining the position of the parties, and pursuant to the requirements set out in Articles 31 to 34 of its Rules of

Procedure, the Inter-American Commission decides to declare the petition admissible for the purpose of examining the alleged violations of the rights set forth in Articles I [Life, liberty and Personal Security], II [Equality before Law], III [Religious Freedom and Worship], X [Inviolability and Transmission of Correspondence], XI [Preservation of Health and Well-being], XVIII [Fair Trial], XXV [Protection from Arbitrary Arrest], XXVI [Due Process of Law] of the American Declaration in the detriment of Mr. Tripathi.

(Exhibit-1) (15) Furthermore, The IACHR will assess at the merits stage whether the alleged denial of judicial documents to an indigent litigant free of cost could constitute a violation of articles IV [Freedom of Investigation, Opinion, Expression and Dissemination] of the American Declaration.

Jurisdiction

② I am an alien, a British Citizen and Defendants of Pennsylvania, Tennessee, Minnesota, Arizona

③ The amount in controversy, exclusive of interest and cost, exceeds \$250,000.

④ Williams v Best Catalyst LLC, 765 F.3d 306 (3rd Cir. 2014) confers jurisdiction.

⑤ The Alien Tort Claims Act, 28 USC 1350, confers jurisdiction as the conduct violates the Laws of Nations and Customary International Law. The Law of Nations in the District Courts Federal Jurisdiction over Tort Claims by Aliens under 28 USC 1350 LBC Intl. Comp. L Rev. 571, 1972

Venue

⑥ Venue is proper in this District because events have been directed from this district,

In a substantial part, Neford, Zwick, Forman, Gallagher, Newby directed events from this District, Rappazzo, Blair, Hochuli, Carter, Morrissey, Klausner, Glynn, Dossett, Bosheszwicz, and Ulibarri voluntarily participated. ~~Other~~

⑦ Other Defendants continued with the events directed from this District.

Statement of Facts Regarding My Medical Condition

⑧ I have high blood pressure, shakes, Tremors, Chronic pain, Constipation, prostate issues, allergies.

I am suppose to have a nephroblast done To my kidneys to see if there is blockage.

If no blockage is found, Then something else shall have to be done.

Centurion is procrastinating and not sending me to be treated.

They are going through the motions to treat me, but their delays show nothing they are doing helps.

They have continued with the practice that Wexford began, Corizon continued, and Centurion, like Wexford and Corizon, have refused to prescribe the course of treatment that did manage my condition. [see ex 1, 2, 3 attached]

Advance Of Litigation

⑨ In advance of litigation, Wexford, Zwick, Forman, Weber Gallagher, Corizon, Conlon, Hoover, Grimm, Basha, Renaud Cook, Quintairas Prieto, Fernandez, Rowey, Smith, Centurion, Barnes, Centene, Acedo, Gottfried, Watanabe, Rand, Struck, Bajonowski, Fletcher, Broening, Orcutt, Struck Watanabe, Carter, Morrissey, Dossett, Erwin, Johnson, Klausner, Glynn, Bosheszwicz, Ullibarri, Ryan, Shinn engineered the

scheme I describe in this Complaint. Then either directly or through local counsel, they deployed their prefabricated defense against me and other pro per prisoner plaintiffs. They used the Permissible Procedural Devices in Bad Faith as in *Laigman* that Williams discussed. They, like Bast, rigged the game from the very beginning.

(9A) Seeking truthful, accurate, non-tainted evidence has never been their objective. Not mischaracterizing but creating alternative facts.

The Directives From Pittsburgh

(10) Wexford is a Healthcare Provider with offices in this District. Zwick, Forman, Weber Gallagher work as its lawyers.

(11) Since its inception emails, internal reports, audits, reports that are in Wexford's files, show that employees and those who work for and on behalf of Wexford have been, upon the directives of Wexford Corporate Management and onsite managers, refusing to provide inmates with healthcare for their serious medical needs, thereby causing deaths, and serious medical

and physical injuries.

~~12~~

(12) Faced with these reports that are unfavorable to Wexford, Wexford has represented to every state prison system, every inmate and every court, that it is providing inmates with treatment that meets community standards and that its managers have not directed any person(s) to provide treatment that does not meet community standards and that does not meet constitutional standards. It has represented that deaths, permanent medical and physical injury is not being caused by any practice of Wexford.

(13) Wexford, Zwick, Forman, Weber Gallagher just as the Cahill law firm did in *Williams v. Best Catalyst LLC*, 765 F.3d 306 (3rd Cir 2014) manufactured favorable evidence,

(14) They assembled template and stock pleadings, discovery and motions documents for use by local counsel in pro per prisoner litigation, that contained false or misleading information about the practices of Wexford. Specifically concealed all emails, reports, and complaints about the practices of Wexford discussed above. They concealed these to frustrate prisoner

litigation. They then submitted false sworn and unsworn representations, including false affidavits, false and incorrect expert reports and discovery response verifications by Wexford employees, officers, consultants, and experts. Specifically they concealed from these the matters disclosed by the documents in paragraph 11, 12.

(15) They used the absence of the inculpatory evidence described in paragraph 11, 12 above and created false exonerating evidence that they use in prisoner pro per litigation. Whenever pro per prisoner lawsuits are filed, Wexford systematically and uniformly represented falsely that they do not have the unofficial practice of engaging in the type of conduct in paragraphs 11, 12 above. They made misstatements in correspondence, responses to discovery and/or pleadings or motion papers, they misled courts as well as adversaries.

(16) Wexford, Zwick, Forman, Weber Gallagher contacted Rappazzo, Blair, Hochuli, Jones Skelton who engaged in the conduct in paragraphs 10 to 15 in *Tripathi v. Hale* CU-15-0140 Inc. DCB. - For example

(a) They concealed emails by Shuler Robertson, Porter, Larson, Robertson, Johnson, Harvey, Castano, Kokemore, Respiro, Morizani, Wekiva Regional Office and others about my medical condition [See also pg 2]

(b) They concealed directives from Pittsburgh, Minutes of Meetings, Audit Reports, employee complaints that referenced and spoke of Wekiva as a matter of its practice, 'has directed employees to delay deny immediate treatment for their serious medical needs

(c) They concealed letters, contract compliance, monitoring reports, warning letters, contract termination letters, that show that Wekiva has the practice of delaying denying medical care causing deaths and serious injury.

(d) All incriminating information was concealed

Integrity of The Judiciary

⑰ Just like Cahill and Bast, Wexford, Zwick, Forman, Weber Gallagher engaged in systematic fraud directed at the integrity of the judicial process. Their specific intent was to obstruct, impede, impair prisoner litigation, and this is exactly what happened to me and other prisoners.

⑱ Wexford, Zwick, Forman, Weber Gallagher obtained an undue advantage by means of some act or omission that is unconscientious or a violation of good faith, the essence of fraud in Bast, to thwart the judicial process.

⑲ Without fear of recrimination, Wexford Zwick, Forman, Weber Gallagher frustrated the search for the truth and purposefully misled prisoner litigants and me by practicing deceit and deception in the course of litigation, by making false misleading statements in the course of judicial proceedings.

⑳ The misconduct by Wexford, Zwick, Forman, Weber Gallagher occurred in and out of courtrooms in Pitts., Tenn., Ill., FL., AZ., Md. No single court had the perspective or authority to mitigate the fraud or the ability to detect it.

②① Wextford was responsible for verifying the truth of its Discovery responses and for suborning or otherwise procuring fake unsworn and sworn representation for its employees, officers, consultants, and experts. This fraud, like that in Bast, has outlasted the of many of the perpetrators.

CU-11-0195 DCB

②② Wextford, Zwick, Forman, Weber Gallagher, Blair, Rappazzo, Hochuli, Jones Skelton in CU-11-0195 DCB engaged in the conduct in paragraph 10 - 21.

The Conduct in Middle District Tennessee

②③ Corizon is a healthcare provider with offices in this district. Conlan, Hoyer, Grimm, Baska, Renaud Cook, Quintanilla Prieto, Fernandez, Rowley, Smith work as its lawyers.

②④ Since its inception, emails, internal reports, audits, reports that are in Corizon's files, show that employees and those who work for and on behalf of Corizon have been, upon the directives of Corizon Corporate Management and onsite managers, refusing to provide inmates with

healthcare for their serious medical needs, thereby causing deaths, and serious medical and physical injuries.

②⑤ Faced with these reports that are unfavourable to Corizon, Corizon has represented to every state prison system, every inmate and every court, that it is providing inmates with treatment that meets Community standards and that it's managers have not directed any person(s) to provide treatment that does not meet Community standards and that does not meet Constitutional standards. It has represented that deaths, permanent medical and physical injury is not being caused by any practice of Corizon.

②⑥ Corizon, Conlon, Hover, Grimm, Basha, Renaud Cook, Quintanros Prieto, Fernandez, Rowley, Smith, just as the Cahill law firm did in Williams v. Basf Catalyst LLC, 765 F.3d 306 (3rd Cir 2014), manufactured favorable evidence.

②⑦ They assembled template and stock pleadings discovery and motions documents for use by local counsel in pro per prisoner litigation, that contained false or misleading information about the practices of Corizon. Specifically concealed all emails

reports, and complaints about the practices of Carizon discussed above. They concealed these to frustrate prisoner litigation. They then submitted false sworn and unsworn representations, including false affidavits, false and incorrect expert reports and discovery responses, verifications by Carizon employee's, officers, consultants, and experts. Specifically they concealed from these the matters disclosed by the documents in paragraphs 24, 25.

(28) They used the absence of the inculpatory evidence described in paragraph 24, 25 above and created false exonerating evidence that they use in prisoner pro per litigation. Whenever pro per prisoner lawsuits are filed, Carizon systematically and uniformly represented falsely that they do not have the unofficial practice of engaging in the type of conduct in paragraphs 24, 25 above. They made misstatements in correspondence, responses to discovery and/or pleadings or ~~motions or~~ Responses, they misled courts as well as adversaries.

(29) Carizon, Conlon, Hoyer, Grimm, Bashq, Renard Cook, Quinteiros Prieto, Fernandez, Rowey, Smith who engaged in the conduct in paragraphs 23-28 in, for example:

(a) They concealed emails from And to KORENORRE, Respicio-MORRISON MARTINEZ, BURCIGA, PERCINS, ROBERTSON / JOHNSON, BUSCHMEIER, HOLLER, WILLIAMS, IQUE, ANDREWS and others that showed CORIZON WAS DENYING ME TREATMENT FOR MY SERIOUS MEDICAL NEEDS.

(b) THEY concealed inculpatory document from CORIZON employees showing that CORIZON employees were altering MY and other inmate medical records and as a consequence they were causing ME and others serious medical injury.

(c) They concealed contract monitoring and contract compliance reports showing CORIZON submitted false contract compliance reports, false reports that they were providing care, they were not providing.

-d) They concealed audits and other inculpatory emails [See Also ex 2]

Integrity of the Judiciary

③① Just like Cahill and Bast, Corizon, Conlon, Hover, Grimm, Basha, Renaud Cook, Quinteiros Prieto, Fernandez, Rowley, Smith engaged in systematic fraud directed at the integrity of the judicial process. Their specific intent was to obstruct, impede, impair prisoner litigation, and this is exactly what happened to me and other prisoners.

③② Corizon, Conlon, Hover, Grimm, Basha, Renaud Cook, Quinteiros Prieto, Fernandez, Rowley, Smith obtained an undue advantage by means of some act or omission that is unconscientious or a violation of good faith, the essence of fraud in Bast, to thwart the judicial process.

③③ Without fear of recrimination, Corizon Conlon, Hover, Grimm, Basha, Renaud Cook, Quinteiros Prieto, Fernandez, Rowley, Smith frustrated the search for the truth and purposefully misled prisoner litigants and me by practicing deceit and deception in the course of litigation, by making false misleading statements in the course of judicial proceedings.

③③ The misconduct by Corizon, Conlon, Haver, Grimm, Basha, Renaud Cook, Quintairo Prieto, Fernandez, Rowey, Smith occurred in and out of courtrooms in Penn., NM., Az., Mn., FL., Tx.. NO single court had the perspective or authority to mitigate the fraud or the ability to detect it.

③④ Corizon was responsible for verifying the truth of its discovery responses and for suborning or otherwise procuring false unsworn and sworn representation for its employees, officers, consultants, and experts. This fraud, like that of Best, has outlasted the of many of the perpetrators.

CIU-13-0615 DCB

CIU-18-0066 RM

③⑤ Corizon, Conlon, Haver, Grimm, Basha, Renaud Cook, Quintairo Prieto, Fernandez, Rowey, Smith in CU-13-0615 DCB and CU-18-0060 RM engaged in the conduct in paragraphs 23-34.

The Conduct in Minnesota/Missouri

③⑥ Centurion is a healthcare provider with offices in this state. Centurion, Centene, Barnes, Broening Oberg work as its lawyers.

(37) Centurion, Centene, Barnes, Broening Obese have engaged in the misconduct similar to that in Paragraphs 9 through 35 in litigation upon the direction of the Centurion Corporate Office litigation staff

THE CONDUCT IN ARIZONA

(38) Carter, Morrissey, Glyn, Klaunder, Johnson, Erwin, Zwick, Forman, Simpson, Rappazzo, Hochuli, Blair, Jones Skelton, Amintario, Austin, FERNANDEZ, Rowen, Conlon, Hovse, Gumm, Bessie, Renaud, Core, Morrissey, Dossett, Boschniewicz, Ullibacari, Concealed on behavior, Welford, Corizon, Ryan, Shwin, email Reports, instructions — that were inculpatory to them and favorable to me, and sent/received by Erwin, Johnson, Klaunder, Glyn, Fizer, Jacobs, Brennan, Shuman, Oster, Curran, Andrews, Pericini, Sequ, Delgado, Porter, Hiney

Among others

(39) These documents in no uncertain and plain terms directed ADAC employees to ~~SEIZE~~ - ~~DESTROY~~ - ~~READ~~ - MY Privileged Documents - And to Retaliate Against ME, ~~SEIZE~~ DESTROY MY legal PAPERS - BASED UPON those emails Ullibarger and Buchmueller READ, ~~SEIZED~~ AND DESTROYED legal MAIL ADDRESSED TO ME, ON CDs that are privileged. Buchmueller and Dosselt ordered I BE DENIED MY Religious Dist DENIED Access to the Courts! BASED ON those Email Reports ADAC Employer DESTROYED MY legal papers AND PROPERTY.

(40) CARTER MORRISON then FABRICATED A DEFENSE in CIV 19-20757, CIVIL-095, CIV 18-0066, Denying the Facts, that are in the inculpatory evidence described above, they concealed! [SEE ALSO pg 2]

THE ROLE OF
PARSONS COUNSEL

(4) Gottfried, Watanabe, Rand, Sommer, Weivert, Bojanowski, Love, Acedo, Fletcher, Orcutt, Sommer, Weivert are Counsel for Shinn and Ryan in Parsons v Ryan Civ 120001 - A Class Action for Arizona Prisoner Healthcare

(42) They have engaged in the conduct in Paragraphs 4 through 41 and as a consequence of their engaging in this misconduct in Parsons, Arizona, Wexham, Centurian have denied me treatment for my serious medical needs. They have concealed evidence that is inculpatory to Shinn and Ryan, Arizona, Wexham, Centurian.

RES JUDICATA COUNSEL
ESTOPPEL

(43) Pursuant to Amurbo v City of Oakland 368 F.3d 1062, 1068 (9th Cir 2004) collateral Estoppel. Res Judicata do not apply.

THE INVESTIGATION - NO AVAILABLE REMEDY

(44) I have utilized the Administrative Remedy Procedure and I have no available Remedy Because those who Administer the procedure have been Directed not to afford me Relief [see at 1 Page 8, 10, 11, 13]

(45) Judicial Remedies have been ineffective as Carter, Morrison and named Defendants have concealed incriminating evidence, in the form of emails and Reports generated by Prison, Cizim, Wexford, Centurion employees

THE IMMINENT DANGER

(46) As a Result of my Being denied Treatment for my Blood Pressure, Pain, Prostate and other issues - I have been told I have to have a Nephrologist to see if my Kidney is blocked and this may cause me serious injury. Has Wexford, Cizim, Centurion continued with the treatment that I received in March 2012 -

Protonix - Gabapentin - Zoloft - Prozac -
Continued with the diet - I would not
have been in imminent danger

(47) I Am 66 years of Age And it is
Very likely that my injury shall be
Permanent

Unbearable Pain

(48) I Am in so much pain And
Suffering that I have to Force
myself to forget the pain, the
shoes, tremor.

Why Have They

Done This

(49) They have Done this As
Punishment for my exercising
the Right to Use the grievance
process And Right of legal
Access As is explained in
Exhibit 1.

COUNT ONECAUSE UNNECESSARY PUNISHMENT

(50) By their actions in Paragraphs 1 to 49 DEFENDANT have inflicted upon me 'cruel and unusual punishment' They have DENIED ME TREATMENT for my serious medical needs inflicting upon me unnecessary pain and suffering. They violated the DeShaney Doctrine because they have the duty to protect me and have failed to. They have the special relationship that mandates they ensure they protect me from harm as my custodian

COUNT TWO - FRAUDULENTCONSPIRACY FRAUD DOCTRINE

(51) DEFENDANT weffus, Zwirk, Forman, Weber, Gallagher, Rappazzo, Hochuli, Jones, Skelton, Blair, Corison, Quintaneros, Pardo, Fernandez, Rivas, Conlon, Houser, Lanning, Basha, Ransom, Cook, Morrison, Carter, Johnson, Kanner, Flynn, Dorella, Roschewicz, Centurion, Barrow, Breening

Ortega, Contino, Gostries, Watanabe, Reno, Strick, Weinerke, Bojanowski, Love, Acosta, Fletcher, Orant, Strick, Weinerke, made the material misrepresentation of Research Existing or Not Fact, with knowledge or belief of its falsity, with an intention that others rely on it or which there was reasonable reliance, as discussed in Paragraphs 9 to 49. This is Fraud and Deceit. They lied and concealed the evidence, as discussed in Paragraph 9 to 46, and their actions constitute Fraudulent Concealment.

(52) These Defendants had a legal obligation to disclose the evidence in connection with existing or pending litigation. The evidence they failed to disclose was material to the litigation. I could not have obtained the evidence from another source. They intentionally withheld, altered, destroyed the evidence to disrupt the litigation. They

Injured Immigrants & Me Because the evidential Record did not contain the concealed evidence.

Count Three

Customary International

Law

(53) I Am an alien within the meaning of ATCA And the conduct in paragraphs 9 through 52 violates Customary International Law as well as Articles I, II, III, X, XI, XVI, IV of the American Declaration and the Law of Nations

Count IV

Conspiracy

(54) Defendants Wilford Zwick, Forman, Weber, Gallagher, Rappazzo, Hochuli, Jones Skelton, Blair, Conizon, Quintana, Prieto, Fernandez, Daisy, Conlon, Flores, Grimm, Berra, Renato Cook, Morosco, Castro, Johnson, Lawrence, Lyman, Dorsett, Roschewicz, Centurion, Baines, Breen

Ortiz, Centeno, Waterhouse, Rand, Steven Weiner, B. Jankowski, Ivan, Acea, Fletcher, Oran, Krawczyk, intentionally made intentional Deliberate Decisions to Disobey Disregard the Law, Policies, Court orders, Misuse procedural Devices guaranteed by Federal Rules.

(38) When they were unaware of all the Participants they were aware of the essential Nature and general scope of the Conspiracy to Engage in the conduct in Paragraphs 1 through 33. My Attorney Client Privilege, Retention against me, Abusing the procedural device under the Federal Rules to deny me Access to evidence that is inculpatory to Corizon, Wellford, Centurion, Putsu, Shinn. Access to Counsel, Right to practice Religion was the Aim of the Conspiracy and the Conspiracy was to ensure my claims were not Reviewed with evidence inculpatory to Defendants and Favorable to me.

(39) Every Defendant furthered the object of the conspiracy by performing what their part of the Conspiracy was and

Another Defendant another Part willfully agreeing to participate with the common Design to Deprive me of the Rights I complain of.

(57) By And through the use of the unlawful MEANS in this Complaint, through the overt Acts in this Complaint, which overt Acts were committed in furtherance of the conspiracy discussed above defendants and each of them ensured 'the conspiracy' continues and succeeds. The conspiracy is open and continues as of this date.

(58) These defendants and each of them are professionals who under no set of circumstances did not know that the wrongs I complain of were not unlawful. They Refused to speak up or disassociate themselves from these acts. It is difficult to understand that all the professional talent, why one of them would not blow the whistle.

(59) Even individual Defendant willfully agreed to become members of the conspiracy.

(62) They committed at least two Acts of racketeering, that Corbin, Welford, Centurian, Renard Cook, Jones Skelton, Chantler, Prieto, Halket, Naby, Stamer, Wiemere, Browning, Rostkies by their actions and actions of members of their crime

(63) The last unlawful Act occurred the last racketeering Act occurred, within few years of the prior Act they are related to each other have a common external ongoing principle, and are continuous

(64) The conduct in paragraphs 1 to 63, violate Arizona, Pennsylvania, and Tennessee RICO Statutes. These defendants conspired or participated directly or indirectly in the affairs of the Connectional Health enterprise through a pattern of racketeering activity and they conspired to do so.

agreeing to participate directly/indirectly in the conduct I allege.

(10) They knew of the conspiracies to deny me equal protection, equal privileges, had the power to prevent or aid in the prevention of the commission of the conspiracies, could have with reasonable diligence, but neglected or refused to prevent the conspiracies.

(6) Arizona allows Rico claims for intangible rights - I sustained reasonably foreseeable injury in my person. By their association in fact defendants in Paragraph 54 formed the Corrections Health enterprise. They are high level managers Agents who authorized, requested, commenced, at the directions of the Chief Executive officer of Arizona Well Form, Centuria, to engage in the conduct I allege.

(b) Defendants Committed Civil
Conspiracies, Conspiracy within the
Meaning of 42 USC 1983, 1985, 1986
And Race Conspiracies - to Violate R.W.

PRAYER FOR RELIEF

I DEMAND A JURY TRIAL,
DAMAGES, Punitive Damage,
Declaratory And other Relief,
Costs, Fee

VERIFICATION

I Declare under the Penalty of
Perjury the contents of this Complaint
Are true and correct, Based on
Reasonable inquiry, not designed
to harass, intimidate, nor for any
improper purpose

Executed on 3/3/20 under
Penalty of Perjury


Arant Vinas Nieto